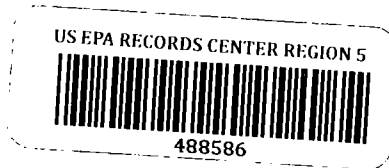




HARRIS CORPORATION

JENNIFER M. BLACK
Senior Counsel, Corporate



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RECEIVED MAR 27 2015 *Lfd ESS#2*

March 26, 2015

Via Federal Express Overnight Delivery

Margaret Herring, Civil Investigator
U.S. Environmental Protection Agency, Region 5
Superfund Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Response to Request for Information for the South Dayton Dump & Landfill Site in Moraine, Ohio ("Site"), dated January 16, 2015 ("Request")

Dear Ms. Herring:

Please accept this letter as the response of Harris Corporation ("Harris") to the above-referenced Request. By email correspondence, Thomas Nash, of USEPA, confirmed that Harris could have until March 27, 2015 to respond to the Request. In addition, USEPA confirmed that the scope of the current Request is limited to the time period of 1941-1996 and to operations within a fifty mile radius of the Site.

Harris objects to the Request to the extent the Request seeks information that is confidential under the attorney-client privilege and protected as attorney work product. Subject to the foregoing objections, and reserving all rights regarding the admissibility of evidence, Harris provides responses to the Request in Exhibit A, attached hereto.

Regards,

Jennifer M. Black
Senior Counsel, Corporate

cc: Thomas Nash, Esq., USEPA

Exhibit A

Response by Harris Corporation to USEPA's Request for Information dated January 16, 2015

1. Identify all persons consulted in the preparation of the answers to these questions.

**Jennifer Black, Senior Counsel, Corporate, Harris Corporation, 1025 W. NASA Blvd.,
Melbourne, FL 32940**

**Anthony Deglomine, Deputy General Counsel, Harris Corporation, 1025 W. NASA Blvd.,
Melbourne, FL 32940**

**Valerie DeFilippo, Legal Administrative Assistant, Harris Corporation, 1025 W. NASA Blvd.,
Melbourne, FL 32940**

**Mark Szymkowiak, former EHS Manager, Harris Corporation, 1025 W. NASA Blvd.,
Melbourne, FL 32940**

2. Identify all documents consulted, examined or referred to in the preparation of the answers to these questions, and provide copies of all such documents.

See attached documents that were produced by Thomas Nash to Harris and produced by Harris to Plaintiffs in response to Discovery Requests in the Hobart v. Dayton Power and Light litigation. Please note, Harris sold its Harris Seybold facility in Dayton in 1973, and does not have any records related to the facility's operations or waste disposal practices. In addition, Harris has recently discovered that one other business line identified as Schriber or Shriber may have operated in Dayton, but that business was sold in 1983 and Harris has no records related to that facility's operations or waste disposal practices.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons. Provide their current, or last known, address, telephone numbers, and e-mail address.

No responsive information has been identified.

4. Provide names, addresses, telephone numbers, and e-mail addresses of any individuals, including former and current employees, who may be knowledgeable about Respondent's operations and hazardous substances handling, storage and disposal practices.

Richard Foley, former employee of Harris Corporation prior to 1983.

Please note that contact with this individual should be made through Harris counsel identified in the cover letter attached hereto.

5. State the date(s) on which the Respondent sent, brought or moved drums and/or hazardous substances to the South Dayton Dump and Landfill (SDDL) Site and the names, addresses,

telephone numbers, and e-mail addresses of the person(s) making arrangements for the drums and/or hazardous substances to be sent, brought or moved to the SDDL Site.

No responsive information has been identified.

6. Did Respondent haul or send materials to SDDL in vehicles it owned, leased or operated? If yes, during what time periods did this occur? If no, how did Respondent transport materials to SDDL? Identify the hauler(s) and provide the addresses, telephone numbers, and e-mail addresses of these entities.

Subject to the objections in the attached cover letter and except as may be set forth in the depositions and exhibits referenced in the response to Question 2, no other responsive information has been identified.

PERMITS/REGISTRATIONS

7. List all federal, state and local permits and/or registrations and their respective permit numbers issued to Respondent for the transport and/or disposal of materials.

Subject to the objections in the attached cover letter, no responsive information has been identified.

8. Which shipments or arrangements were sent under each permit? If what happened to the hazardous substances differed from what was specified in the permit, please state, to the best of your knowledge, the basis or reasons for such difference.

Subject to the objections in the attached cover letter, no responsive information has been identified.

9. Were all hazardous substances transported by licensed carriers to hazardous waste Treatment Storage and Disposal Facilities permitted by the U.S. EPA?

Subject to the objections in the attached cover letter, no responsive information has been identified.

10. List all federal, state and local permits and/or registrations and their respective permit numbers issued for the transport and/or disposal of wastes.

Subject to the objections in the attached cover letter, no responsive information has been identified.

11. Does your company or business have a permit or permits issued under Resource Conservation and Recovery Act? Does it have or has it ever had, a permit or permits under the hazardous substance laws of the State of Ohio? Does your company or business have an EPA Identification Number, or an identification number supplied by the State Environmental Protection Agency? Supply any such identification number(s) your company or business has.

Subject to the objections in the attached cover letter, no responsive information has been identified.

12. Identify whether Respondent ever filed a Notification of Hazardous Waste Activity with the EPA or the corresponding agency or official of the State of Ohio, the date of such filing, the wastes described in such notice, the quantity thereof described in such notice, and the identification number assigned to such facility by EPA or the state agency or official.

Subject to the objections in the attached cover letter, no responsive information has been identified.

**RESPONDENT'S DISPOSAL/TREATMENT/STORAGE/RECYCLING/SALE
OF WASTE (INCLUDING BY-PRODUCTS)**

13. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management. For each individual identified in response to this question provide the current or most recent known address, telephone number and e- mail address.

Subject to the objections in the attached cover letter, no responsive information has been identified.

14. Describe the containers used to take any type of waste from Respondent's operation, including but not limited to:
 - a. the type of container (e.g. 55 gal. drum, dumpster, etc.);
 - b. the colors of the containers;
 - c. any distinctive stripes or other markings on those containers;
 - d. any labels or writing on those containers (including the content of those labels);
 - e. whether those containers were new or used; and
 - f. if those containers were used, a description of the prior use of the containers.

Subject to the objections in the attached cover letter, no responsive information has been identified.

15. For any type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling. Provide copies of all documents relating to the transportation or disposal of said waste, including correspondence and

manifests. Include all correspondence and records of communication between Respondent and Cyril Grillot, Kenneth Grillot, Alcine Grillot, or Horace Boesch, Sr.

Subject to the objections in the attached cover letter, no responsive information has been identified.

16. Provide copies of such contracts and other documents reflecting such agreements or arrangements.
- g. State where Respondent sent each type of its waste for disposal, treatment, or recycling.
 - h. Identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).
 - i. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.
 - j. For each type of waste specify which Waste Carrier picked it up.
 - k. For each type of waste, state how frequently each Waste Carrier picked up such waste.
 - l. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).
 - m. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.
 - n. Provide copies of all documents containing information responsive to the previous seven questions.
 - o. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to:
 - i. the type of vehicle (e.g., flatbed truck, tanker truck, containerized dumpster truck, etc.);
 - ii. names or markings on the vehicles; and
 - iii. the color of such vehicles.
 - j. Identify all of each Waste Carrier's employees who collected Respondent's wastes.

- k. Indicate the ultimate disposal/recycling/treatment location for each type of waste.
- l. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.
- m. Describe how Respondent managed pickups of each waste, including but not limited to:
 - i. the method for inventorying each type of waste;
 - ii. the method for requesting each type of waste to be picked up;
 - iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
 - iv. the amount paid or the rate paid for the pickup of each type of waste;
 - v. the identity of (see Definitions) Respondent's employee who paid the bills; and
 - vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.
- n. Identify the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.
- o. State the basis for and provide any documents supporting the answer to the previous question.
- p. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
 - i. the nature and chemical composition of each type of waste;
 - ii. the dates on which those wastes were disposed;
 - iii. the approximate quantity of those wastes disposed by month and year;
 - iv. the location to which these wastes drained (e.g. on-site septic system, onsite storage tank, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
 - v. whether and what pretreatment was provided.
- q. Identify any sewage authority or treatment works to which Respondent's waste was sent.

- r. If not already provided, specify the dates and circumstances when Respondent's waste was taken to the SDDL Site, and identify the companies or individuals who brought Respondent's waste to the Site. Provide all documents which support or memorialize your response.

For Item 16 and all subparts thereto, subject to the objections in the attached cover letter, no responsive information has been identified.

RESPONDENT'S ENVIRONMENTAL REPORTING:

17. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Subject to the objections in the attached cover letter, no responsive information has been identified.

18. Identify (see Definitions) all federal offices to which Respondent has sent or filed information about hazardous substance or hazardous waste.

Subject to the objections in the attached cover letter, no responsive information has been identified.

19. State the years during which such information was sent/filed.

Subject to the objections in the attached cover letter, no responsive information has been identified.

20. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

Subject to the objections in the attached cover letter, no responsive information has been identified.

21. State the years during which such information was sent/filed.

Subject to the objections in the attached cover letter, no responsive information has been identified.

22. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq.; Solid Waste and Infectious Waste Regulations, OAC 3745-27 (former rule EP-20); Licenses for Solid Waste, Infectious Waste Treatment, or Construction and Demolition Debris Facilities, OAC 3745-37 (former rule EP-33); Solid and Hazardous Wastes, ORC 3734-01 through 3734-11; Open Burning Standards, OAC 3745-19-03.

Subject to the objections in the attached cover letter, no responsive information has been identified.

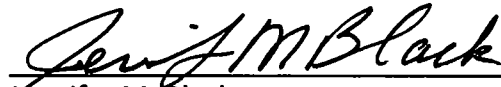
23. Identify the federal and state offices to which such information was sent.

Subject to the objections in the attached cover letter, no responsive information has been identified.

CERTIFICATION

I certify on this 26th day of March 2015, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Jennifer M. Black
Senior Counsel, Corporate
Harris Corporation

RECEIVED MAR 27 2015 *Apd ESS#2 (SDD B52B)*

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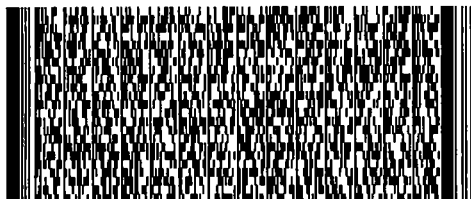
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CHICAGO, IL 60604

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